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18 Attorneys for Plaintiff United States of America

19 UNITED STATES DISTRICT COURT
20 EASTERN DISTRICT OF CALIFORNIA

21 United States of America,

22 Plaintiff,

23 v.

24 CB SURETY, LLC, et al.,

25 Defendants.
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27

Civil Case No. 2:23-cv-02812-TLN-SCR

JOINT MOTION FOR ENTRY OF
PERMANENT INJUNCTION AND FINAL
JUDGMENT AS TO DEFENDANTS
THOMAS EIDE AND CASCADES
POINTE AT CLEMSON, LLC

1 On December 1, 2023, the United States of America filed its Complaint for a Temporary
2 Restraining Order, Preliminary and Permanent Injunctions, and Other Equitable Relief (the
3 “Complaint”) (ECF No. 1) against Defendants Thomas Eide and Cascades Pointe at Clemson,
4 LLC (“Cascades Pointe”), and other named Defendants, pursuant to 18 U.S.C. § 1345, based on
5 Defendants’ alleged violations of 18 U.S.C. §§ 1343, 1344, and 1349. On December 6, 2023, the
6 Court issued its Order granting the United States’ *Ex Parte* Motion for a Temporary Restraining
7 Order (“TRO”) (ECF No. 7). On January 5, 2024, the Court issued its Order granting the United
8 States’ request for a preliminary injunction (ECF No. 35).

9 The United States and Defendants Thomas Eide and Cascades Pointe now stipulate and
10 agree to the entry of the Proposed Stipulated Order for Permanent Injunction and Final Judgment
11 (“Proposed Order”), lodged concurrently with this Motion. The terms of the permanent
12 injunction are set out in the Proposed Order. Thomas Eide and Cascades Pointe stipulate to this
13 Motion and Proposed Order freely and without coercion. Thomas Eide and Cascades Pointe
14 further acknowledge that they have read the provisions of this Motion and the Proposed Order,
15 understand them, and are prepared to abide by them.

16 The United States and Thomas Eide and Cascades Pointe agree that the Proposed Order is
17 fair, reasonable, lawful, and not contrary to public policy. The Proposed Order is the result of
18 negotiations between the United States and Thomas Eide and Cascades Pointe, which are
19 represented by counsel, and avoids further litigation costs between the United States and Thomas
20 Eide and Cascades Pointe.

21 The United States and Thomas Eide and Cascades Pointe acknowledge and understand
22 that this Motion and the Proposed Order relate to and are intended to resolve only the claims
23 against Thomas Eide and Cascades Pointe in the above-captioned civil lawsuit. This Motion and
24 the Proposed Order do not resolve the United States’ claims against any other entity or individual
25 named in the Complaint. It does not limit the Receiver’s authority to act on behalf of any other
26 Receivership Entity. This Motion and Proposed Order also do not constitute a global resolution
27 of all potential claims against Thomas Eide and Cascades Pointe for the conduct alleged in the

1 Complaint. It does not prevent the United States from pursuing criminal penalties against
2 Thomas Eide and Cascades Pointe in relation to the conduct alleged in the Complaint. It does not
3 prevent the United States from bringing an asset forfeiture action seeking to recover funds
4 obtained through the conduct alleged in the Complaint, including funds held by Thomas Eide
5 and Cascades Pointe. Nor does this Motion and the Proposed Order constitute evidence that
6 Thomas Eide and Cascades Pointe committed the acts alleged in the Complaint, or in any way
7 prejudice Thomas Eide's and Cascades Pointe's ability to contest the allegations in the
8 Complaint in a future proceeding. This Motion and the Proposed Order relate solely to the claims
9 against Thomas Eide and Cascades Pointe in the above-captioned lawsuit.

10 The undersigned parties and counsel each represent that they are fully authorized to enter
11 into the terms and conditions of the Proposed Order and to execute and legally bind to this
12 document the party that they represent.

1 SO STIPULATED AND AGREED:

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3 FOR PLAINTIFF UNITED STATES OF AMERICA

4 MICHELE BECKWITH
5 United States Attorney
6 TARA AMIN
7 Assistant United States Attorney

8 YAAKOV ROTH
9 Acting Assistant Attorney General
10 MICHAEL GRANSTON
11 Deputy Assistant Attorney General

12 AMANDA N. LISKAMM
13 Director, Consumer Protection Branch
14 LISA K. HSIAO
15 Deputy Director, Civil Litigation
16 Consumer Protection Branch

17 C.B. BUENTE
18 Assistant Director, Consumer Protection Branch
19

20 /s/ _____ Date: 4/11/2025

21 ANDREW K. CRAWFORD
22 FRANCISCO L. UNGER
23 Trial Attorneys
24 United States Department of Justice

25 *Attorneys for Plaintiff United States of America*
26
27

28 FOR THOMAS EIDE AND CASCADES POINTE AT CLEMSON, LLC

29 /s/ _____ Date: 4/11/2025

30 DANIEL OLMOS

31 *Attorney for Thomas Eide and Cascades Pointe at Clemson, LLC*
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